

FCC Consumer Advisory Committee
Recommendation Regarding FCC IVR and Web-based complaint handling process

The Consumer Advisory Committee (CAC) of the Federal Communications Commission (Commission) respectfully submits these comments in response to a request from FCC staff to review the Commission's telephone interactive voice response (IVR) and online complaint processes. This review comes in the context of a broad review of the FCC's complaint-handling process currently under way.

The purpose of the CAC is to make recommendations to the Commission regarding consumer issues within the jurisdiction of the Commission and to facilitate participation of all consumers in proceedings before the Commission. To accommodate staff's request, the CAC established a Consumer Complaint Task Force (CCTF)¹ that was charged with testing the IVR (i.e. the FCC Consumer Center accessed via the 888-225-5322 telephone number) and web-based complaint processes (accessed at www.fcc.gov/complaints) and providing feedback to the CAC. To date the CCTF has met via teleconference three times and provided an informal briefing to FCC staff to discuss the task force's findings.

¹ The full list of CCTF member representatives is as follows: Ed Bartholme (Call For Action), Scott Bergmann (CTIA – The Wireless Association), Debra Berlyn (National Consumers League), Lise Hamlin (Hearing Loss Association of America), Mitsuko Herrera (Montgomery County, MD Office of Cable and Broadband Services), Irene Leech (Consumer Federation of America), Mia Martinez (National Asian American Coalition), Ken McEldowney (Consumer Action), Art Neill (New Media Rights Project), Stephanie Podey (National Cable & Telecommunications Association), Paul Schroeder (America Foundation for the Blind), Dorothy Walt (Helen Keller National Center for Deaf-Blind) and Olivia Wein (National Consumer Law Center).

Based on the CCTF's findings, the CAC makes the following recommendations for ways that the Commission should improve its complaint-handling process:

Regarding the IVR process:

- The Commission should create an IVR system for consumer-related issues separate from industry-related issues;
- The Commission should create a dedicated phone number exclusively for the submission of consumer complaints;
- Where possible, the Commission should seek to reduce the number of options presented in the IVR menus and allow for more functionality to ease navigation between menus;
- Wordiness and overuse of industry jargon (e.g. "slamming," "DTV," "wireless spectrum management") should be reduced or eliminated;
- The Commission should make it easier for consumers to reach a live specialist; and
- The hours of the call center should be extended, or at the very least the Commission should provide clear notification of the hours a live specialist may be reached.

Regarding the online complaint process:

- The Commission should review the three levels of the online complaint system (i.e. complaint types, categories and forms) to ensure that complaints

about specific categories of service (e.g. bundled services) are more apparent;

- The Commission should seek to reduce confusing and/or misleading verbiage in the online complaint website's menus;
- The Commission should ensure that all menus and forms are screen-reader compatible;
- The Commission should lift the 1,000 character limit in online form comment fields to allow consumers sufficient room to accurately convey their concerns; and
- The Commission should ensure that the complaint forms specify what information is required and what is optional in order for consumers to continue with the complaint process.

Regarding the complaint-handling process generally:

- The Commission should seek guidance from complaint specialists at the Consumer Financial Protection Bureau and Federal Trade Commission regarding those agencies' complaint-handling processes;
- The Commission should make instructions on how to file a complaint more prominent on both the www.FCC.gov homepage and the online complaints landing page (www.fcc.gov/complaints);
- The Commission should prominently include instruction on how to reach a live complaint specialist by phone (and the business hours for the call center and ASL operator) on the www.fcc.gov/complaints page; and

- The Commission should streamline the process for forwarding complaints to telecommunications providers for investigation.

In conclusion, we appreciate the Commission's consideration of the CAC's input on this topic. Given the importance of the Commission's complaint-handling process in providing guidance to the Commission's enforcement, policy-making and consumer education activities, it is imperative that the complaint-handling process be made more consumer-friendly.

DATE ADOPTED: September 21, 2012

Respectfully Submitted:

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Chairperson
FCC Consumer Advisory Committee